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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL ENVIRONMENTAL SATELLITE, DATA,
AND INFORMATION SERVICE

Washington, D.C. 20233

Office of Radio Frequency Management
Room 3332, Federal Office Bldg. #4
Washington, D.C. 20233

October 2, 1992

ORIGINAL

Office of the Secretary,
Federal Communications Commission
Washington, D.C. 20554

Ref: CC Docket No. 92-166

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FILE

To the Commission:

On August 7, 1992, the Commission issued a Public Notice requesting comments on the establishment of an Advisory Committee to negotiate operating rules for Mobile Satellites operating above 1 GHz ("Big LEOs"). The Notice refers specifically to the bands 1610-1626.5 MHz and 2483.5-2500 MHz as those to be addressed by the proposed Committee. Neither band is currently used by NOAA, which did not propose to participate in the work of the Committee. The final date for the filing of requests to participate is given by the Notice as September 14, 1992.

On September 14, Motorola filed comments /1 which proposed additional spectrum to Big LEOs. It referred to Motorola's previous filing /2 proposing expedited use of the band 1675-1710 MHz for the Mobile Satellite Service (MSS), a proposal opposed by other applicants, by NOAA, and by the National Telecommunications and Information Administration. Motorola subsequently filed a Petition for Rulemaking /3 proposing that at least 10.5 MHz of additional spectrum be allocated to the MSS, and that the 1675-1710 MHz be considered as the source of this spectrum.

/1 Comments of Motorola Satellite Communications, Inc. in this docket dated September 14, 1992

/2 Petition for Expedited Action by Motorola Satellite Communications, Inc. dated June 9, 1991, in the Matter of the applications of Motorola Satellite Communications, Inc., et al. File Nos. 9-DSS-F-91(87), CSS-91-101 etc.

/3 Petition for Rulemaking dated September 22, 1992

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The bands discussed in the Commission's Notice were part of the U.S. proposals for WARC-92, and their use for the MSS has been under study for several years. On the other hand, no applicant has proposed to use the 1675 MHz band for his own system, and there are no realistic system designs for the Advisory Committee to consider. The consideration of new bands, not previously proposed by the Commission, must necessarily delay the work of the Committee. The speedy introduction of Big LEO services would be best served by limiting the Advisory Committee to consideration of those bands originally proposed in the Notice.

No Committee member proposed in the FCC Notice would represent the interests of the meteorological community. Therefore, should the Commission decide to include consideration of bands used by NOAA (e.g. 1675-1710 MHz) into the charter of the Committee, Commerce requests participation based on the fact that NOAA's METSAT networks could be significantly affected by the proposed MSS systems and the FCC rules under which they operate. Its representative will be Richard Barth, Director of the Office of Radio Frequency Management, acting in his capacity as spectrum manager for the Department of Commerce. He will negotiate, actively and in good faith, the development of operating rules for mobile satellite systems to ensure their successful and compatible operation.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Barth", with a stylized, flowing script.

Richard Barth
Director

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